

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GUCCI AMERICA, INC.,

Plaintiff,

vs.

JENNIFER GUCCI, JENCO DESIGNS, LLC, JENNICOR,
LLC, JENNY GUCCI COFFEE AND GELATO
COMPANY, INC., VERATEX, INC., COLLEZIONE DI
CASA, INC., E.L. ERMAN-DEAD SEA COSMETICS
CORP., ELE BRANDS ENTERPRISE, INC., GBN
WATCH COLLECTION, INC., GBN GLOBAL BUSINESS
NETWORK, EDWARD LITWAK, d/b/a ED LITWAK &
ASSOCIATES, GEMMA GUCCI, GEMMA GUCCI
COFFEE AND GELATO COMPANY, INC., ABC
CORPORATIONS 1-10, and JOHN DOES 1-10,

Defendants.

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: 07 CIV. 6820 (RMB)
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: **DEFENDANTS' INITIAL**
: **DISCLOSURES**

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Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Defendants
Veratex, Inc., Collezione Di Casa, Inc., ELE Erman – Dead Sea Cosmetics Corp., ELE
Brands Enterprise, Inc., GBN Watch Collection, Inc., and GBN Global Business
Network (collectively, “Defendants”), provide the following Initial Disclosures to
Plaintiff Gucci America, Inc.

- (A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

On behalf of Veratex, Inc. and Collezione Di Casa, Inc.: Avi Cohen, Dale Talbert, and, to a much lesser extent, other employees of Veratex, Inc. and Collezione Di Casa, Inc., all of whom may be contacted through counsel and who have the following

business address 14000 Arminta Street, Panorama City, CA 91402, telephone (818) 994-6487. On behalf of E.L. Erman – Dead Sea Cosmetics Corp. and other related entities: Jacob Ergas, David Elan, and, to a much lesser extent, other employees, all of whom may be contacted through counsel and who have the following business address: 31238 Via Colinas Unit A, Westlake Village, CA 91362, telephone (818) 707-9955. Additional parties with information include Jennifer Gucci and Ed Litwak, who may be contacted through counsel. All individuals listed by other parties.

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, the Defendants reserve the right to supplement these disclosures or responses, when appropriate, throughout discovery.

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, care or control of the party and that the disclosing party may use to support its claim or defenses, unless solely for impeachment:

Responding parties believe that copies of all documents discovered to date have previously been provided to Plaintiff.

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, the Defendants reserve the right to supplement and amend these disclosures or responses, when appropriate, throughout discovery.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

At this time responding parties are only defendants to the action and are not claiming damages other than costs and attorneys' fees incurred.

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, the Defendants reserve the right to supplement and amend these disclosures or responses, when appropriate, throughout discovery.

- (D) **For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Responding parties believe that copies of any such documents have previously been provided to Plaintiff's attorneys.

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, the Defendants reserve the right to supplement and amend these disclosures or responses, when appropriate, throughout discovery.

Dated: New York, New York
December 7, 2007

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